

WILLIAM OMAR MEDINA

CIVIL ACTION

V.

NO. 20-2426 / Filed 5/27/2021

ALFRED HALKMAN; ET AL

LEHIGH CO. ADMINISTRATION

"INDIVIDUALS & CAPACITY"

Kyle Russell

AMENDED COMPLAINT & EXTEND SUMMARY JUDGEMENT DEADLINE

Pursuant to Fed. R. Civ. P 7 (b) and this Court's Policies and Procedures Section I (A), Petitioner, WILLIAM MEDINA respectfully requests The Lehigh Co. Administration Kyle Russell and responsible parties be added for Denial of Full Access to Courts by Means of denying LAW LIBRARY ON 5-27-2021 of Tablets to all inmates on unit 2C at Lehigh Co. Prison, Furthermore limited time of 2HRS on everyday of Exercise time of Showers Phone calls, video calls & LAW LIBRARY TIME!

1. There is a current logjam of Criminal Matters due to the pandemic. These Criminal Matters require the usage of limited rooms, with limited telephone and poor internage usage thus leaving us to not meet deadlines of May 17, 2021 - June 7, 2021 and June 8, 2021 Declared by the Courts, On Order Dated January 14th 2021 Courts refer this Matter to a potential appointment of volunteer Counsel

Case 5:20-CV-02426-MAK Document 2 of 3
From our Prisoner Civil Rights Panel which was not ever provided to help aid Prisoner who is being denial of access to the courts by Mean of No Law Library, Now Comes Petitioner in good Cause to get assigned law Library time and Counsel for legal representation in the Proceeding of this Civil Action at Stake that Alfred Hallman's Attorney's are Jamming A Response to deadlines not being able to be met with A 202 pages OF Summary Judgement with Discovery Exhibits.

2. A Court May appoint an Attorney to represent any unable person to afford Counsel
28 U.S.C § 1915 (e)

Federal district Courts have " A good deal of discretion to determine whether representation is warranted given the nature of the case and litigants.

Chambers v. Pennycook, 641 F.3d 898, 909
(8th Cir. 2011)

Mental health detainee 28 UCS § 1915, Part 1 of 2
Gibson v. City Municipality of New York,
692 F.3d 198, 2019 U.S. App. LEXIS 17003
(2d Cir. 2012) 28 USCS 1915 Proceedings in
Forma pauperis.

Certificate of Service

I, William Omar Medina, do certify and hereby confirm that a true and correct copy OF the Forgoing AMENDED COMPLAINT AND EXTEND OF SUMMARY JUDGEMENT AND REQUEST OF COUNSEL REPRESENTATION has been served upon The Honorable Judge Mark A. Kearney Kearney@pa.ed.uscourts.gov
Fax # 267-299-5023 - 267-299-7680

Clerk of Courts, EDPa
James A. Byrne U.S Courthouse
Room 2609
601 Market Street.
Philadelphia, PA 19106

Fax due to limited timing of Defendant's Attorney serving over amount of Legal documents to respond.

DATE 5/27/2021

William Medina.
38 N. 4TH ST.
Allentown PA 18102
William Medina # 73276

INMATE'S REQUEST TO STAFF

Pedida de encarcelado a empleado

LEHIGH COUNTY

DEPARTMENT OF CORRECTIONS

TO (Name and Title of Officer)

PARA: (Nombre y Titulo)

Brian Foster

DATE

(FECHA)

5/27/2021

BY: (Inmate Name and ID Number)

DE: (Nombre y Numero)

W. Medina # 73276

QUARTERS ASSIGNMENT:

LOCAL DENTRO DE LA CARCEL:

2C # 14

SUBJECT: State completely but briefly the problem on which you desire assistance. Give details.

ASUNTO: Describa completamente pero brevemente el problema con que desea asistencia. Incluya detalles.

Please Fax Judge Mark A. Kearney
at # 267-299-5023

267-299-7680

Kearney@pa.ed.uscourts.gov

Send Copy and Please send Proof these
documents were sent

T.Y.
Gracely Appreciated

WAS DENIED TO BE SENT OR COPIED
By Email OR FAX

DISPOSITION: (DO NOT WRITE IN THIS SPACE)

DISPOSICION: (NO ESCRIBA EN ESTE ESPACIO)

STAFF MEMBER

EMPLEADO DE LA CARCEL

DATE

FECHA

NAME: William Medina #73276
LEHIGH COUNTY JAIL
38 NORTH 4TH STREET
ALLENTOWN, PA 18102-3489

LEHIGH VALLEY PA 180

28 MAY 2021 PM 3 L



U.S.M.S.
X-RAY

JAMES A. BYRNE
CLERK OF COURTS, EDPs
ROOM 2609
601 MARKET STREET.
PHILADELPHIA, PA 19106

19106-173253

